

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

Case No. 7:16-cv-30

BONNIE PELTIER, as Guardian	:	
of A.P., a minor child;	:	
	:	
ERIKA BOOTH, as Guardian	:	
of I.B., a minor child; and	:	
	:	
PATRICIA BROWN, as Guardian	:	
of K.B., a minor child;	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
CHARTER DAY SCHOOL, INC.; ROBERT P.	:	
SPENCER; CHAD ADAMS; SUZANNE WEST;	:	
COLLEEN COMBS; TED BODENSCHATZ; and	:	
MELISSA GOTT in their capacities as members of the	:	
Board of Trustees of Charter Day School, Inc.; and	:	
THE ROGER BACON ACADEMY, INC.;	:	
	:	
Defendants.	:	
	:	

**MOTION FOR APPOINTMENT OF
GUARDIAN AD LITEM**

Undersigned counsel for A.P. moves for an Order appointing Bonnie Peltier Guardian ad Litem to act on A.P.'s behalf in this action pursuant to Fed. R. Civ. P. 17(c) and LR 17.1(a); and, in support of this motion, shows that:

1. A.P. is a minor.
2. This action was brought against Charter Day School, Inc., members of its Board of Trustees, and The Roger Bacon Academy, Inc., for declaratory and injunctive relief and nominal damages arising out of sex discrimination at Charter Day School, a public charter school in Leland, Brunswick County, North Carolina.

3. The affidavit of the proposed Guardian ad Litem, Bonnie Peltier (attached), shows that Ms. Peltier is competent to protect A.P.'s interests, has no interest adverse to A.P.'s interests, and does not have any business relationship with defendants or their counsel in this action.

4. No representative or guardian has previously been appointed to act on behalf of A.P., and, until now, Ms. Peltier has acted on A.P.'s behalf in this matter.

5. As stated in the affidavit, annexed as Attachment No. 1, Ms. Peltier is competent to be appointed Guardian ad Litem for A.P.

Respectfully submitted this the 2nd day of June, 2016.

ELLIS & WINTERS LLP

/s/ Lenor Marquis Segal

Lenor Marquis Segal

NC State Bar No. 43445

Post Office Box 33550

Raleigh, NC 27636

Telephone: (919) 865-7000

Facsimile: (919) 865-7010

lenor.marquisssegal@elliswinters.com

Local Civil Rule 83.1 Counsel

AMERICAN CIVIL LIBERTIES UNION OF NORTH
CAROLINA LEGAL FOUNDATION

/s/ Christopher A. Brook

Christopher A. Brook

NC Bar No. 33838

Legal Director, American Civil Liberties Union
of North Carolina Legal Foundation

Post Office Box 28004

Raleigh, North Carolina 27611

Telephone: (919) 834-3466

Facsimile: (866) 511-1344

cbrook@acluofnc.org

AMERICAN CIVIL LIBERTIES UNION FOUNDATION

/s/ Lenora M. Lapidus

Lenora M. Lapidus

(LR 83.1(a) *special appearance*)

Galen Sherwin

(LR 83.1(a) *special appearance*)

Amy Lynn Katz

(LR 83.1(a) *special appearance*)

Women's Rights Project

125 Broad Street, 18th Floor

New York, NY 10004

Telephone: (212) 549-2615

llapidus@aclu.org

gsherwin@aclu.org

wrp_ak@aclu.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2016, I electronically filed this Motion for Appointment of Guardian ad Litem with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Lenor Marquis Segal
Attorneys for Plaintiffs